

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: KEVIN HUDSON KEMP
Debtor**

**CHAPTER 12
CASE NO. 20-00655-NPO**

**MOTION TO CONVERT CHAPTER 12 CASE
TO SUBCHAPTER V CASE UNDER CHAPTER 11**

COMES NOW Kevin Hudson Kemp (the “Debtor”), and files this his Motion to Convert Chapter 12 Case to Subchapter V Case Under Chapter 11 (the “Motion”), and in support thereof, would show unto this Honorable Court as follows, to-wit:

1. It does not appear that continuing with Plan confirmation of the Debtor’s Chapter 12 case will be productive or beneficial because the compensation requested by the Chapter 12 Trustee will either cause the Plan to lack feasibility, or is excessive when compares to the cost, expenses and fees in Subchapter V.

2. Accordingly, it is the best interest of the Debtor, all creditors and all parties in interest to convert this Chapter 12 case to a case under Subchapter V of the Bankruptcy Code.

3. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof, this Honorable Court will convert this Chapter 12 case to a case under Chapter 11 and a

Subchapter V case thereunder. Debtor prays for general relief.

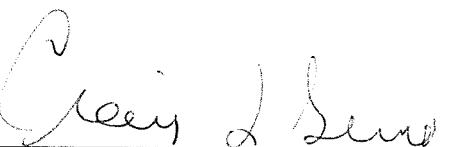
THIS, the 9th day of December, 2020.

Respectfully submitted,

KEVIN HUDSON KEMP

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno, Esq. - MSB No. 4793
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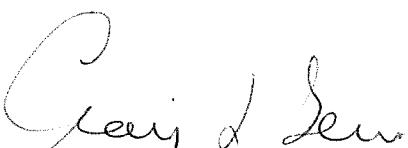
CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing to the following:

Harold J. Barkley, Jr., Esq.
hjb@hbarkley13.com

Christopher J. Steiskal, Esq.
christopher.j.steiskal@usdoj.gov

THIS, the 9th day of December, 2020.


Craig M. Geno